



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

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Dear Lessee/Operator:

Attached for your information is the Bureau of Land Management, Wyoming and Nebraska Notice to Lessee/Operator (NTL) 2004-1, Standards for the Use of Electronic Flow Computers Used on Differential Type Flow Meters For Gas Measurement. The NTL informs Federal and Indian lessees/operators of the minimum standards for Electronic Flow Computers (EFCs) used on differential-type flow meters for gas measurement.

A draft NTL was originally issued for public comment in November 2001. After the comment period several major modifications were made to the NTL. Due to these changes the NTL was reissued for public comment in July 2003. During this comment period numerous requests were made for additional time to allow industry to thoroughly analyze and provide in depth responses to the NTL. Several extensions were granted over the next several months culminating in a public meeting on December 11, 2003, and ending the formal comment period.

The purpose for establishing the NTL was based on a combination of factors. Significant factors include:

1. The overwhelming adoption of these types of devices by industry for the measurement of lease gas.
2. The inherent complexity and variety of these types of devices.
3. Workload strains for both the industry and BLM caused by the requirement to approve these devices on a case by case, or well by well basis (refer to Onshore Order No. 5, Measurement of Gas, IV., Variances from Minimum Standards).
4. Inconsistent application of requirements and standards when approving these devices.
5. Lack of standards, policy and guidance for both industry and BLM to follow when allowing the use of these devices

The NTL standards apply to all EFC installations and supercede and replace all existing local NTLs and variances addressing EFC installation and approval. All EFCs already installed and operating prior to this notice shall be subject to all of the new provisions of the NTL. EFCs previously approved under local NTLs and variances within Wyoming and Nebraska shall be granted a one-year grace period from the issuance of this NTL in order to bring those EFCs into compliance. Below is a summary of what the NTL addresses:

I. Standards that are incorporated by reference, including Onshore Order 5, applicable sections of API 21.1, AGA Report No. 3 (1985 and 1992), and AGA 8/NX-19

II. Data requirements including on-site displays and other information, data retention, and technical documentation of equipment

III. Verification and calibration requirements and tolerances

IV. Uncertainty requirements ($\pm 3\%$) and low-flow cutoff limits

Effective immediately, all Wyoming BLM Field Offices will implement the NTL standards for all approved BLM points of measurement utilizing EFCs. EFCs which meet the requirements of this NTL shall be accepted without need for further approval. Operators who are found to have EFCs which do not comply with the standards, and are not covered by the grace period, will be notified and required to immediately take corrective actions to bring the EFCs into compliance.

/S/ Robert A. Bennett

Robert A. Bennett
State Director

Attachments:

- 1 - Wyoming Notice to Lessee/Operator 2004-1 (5p)
- 2 - Response to Comments (22p)